

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

PHI THETA KAPPA HONOR SOCIETY,

Plaintiff/Counter-Defendant,

v.

HONORSOCIETY.ORG INC.,

Defendant/Counter-Plaintiff

HONOR SOCIETY FOUNDATION, INC.,

Defendant.

Civil Action No. 3:22-cv-00208-CWR-RPM

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HONORSOCIETY.ORG INC.,

Defendant/Counter-Plaintiff/Third-  
Party Plaintiff

v.

LYNN TINCHER-LADNER,

Third-Party Defendant.

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**Declaration of Michael Moradian**

I, Michael Moradian, hereby declare, under 28 U.S.C. § 1746, as follows:

1. I am over 18 years of age, competent to testify to the matters stated herein, and make this declaration on the basis of personal knowledge.

2. I am the founder, President, Treasurer, and executive director of defendant HonorSociety.org Inc. (“HonorSociety”).

3. I am also the President and Treasurer of defendant Honor Society Foundation Inc., a Nevada nonprofit corporation (“The Foundation”). Since 2019, The Foundation has been recognized by the IRS as a 501(c)(3) public charity.

**A. My experience helping students**

4. I have received various awards and recognitions for my initiatives relating to helping students, such as being named one of Bloomberg Businessweek’s America’s Best Young Entrepreneurs, which can be found at <https://www.bloomberg.com/news/articles/2010-10-28/the-winning-young-entrepreneurs-2010businessweek-business-news-stock-market-and-financial-advice>.

5. In 2007, I graduated with honors from UCLA with a degree in business economics from the economics department.

6. In 2008, I created an organization called CampusBuddy Inc. CampusBuddy is an academic social network and media website. It provided an internet platform for students that helped them better understand their university, select courses, connect with classmates, and otherwise help enhance their social-networking experience.

7. I later created a business called CollegeBudget.com, which focused on using collective buying approaches to save students money on college necessities and discretionary purchases.

**B. HonorSociety**

8. I started HonorSociety.org Inc. in 2014. HonorSociety provides a wide range of benefits to students and lifelong learners. HonorSociety helps students place jobs, find mentors, receive discounts, etc. HonorSociety has also funded hundreds of students with scholarships.

9. Because its members overwhelmingly appreciate such benefits, HonorSociety has a “no questions asked” refund policy (as explained at <https://www.honorsociety.org/cancel>). Attached as **Exhibit 1** is a true and correct copy of that policy. That means any member can request and receive a refund for any reason with no questions asked.

10. Historically, many honor societies did not initially have GPA requirements. These were introduced in the early 20th century. Often cited as “tradition” and “history”, GPA requirements became a gatekeeping mechanism that often excluded students from

underrepresented and marginalized groups, who might face systemic barriers affecting their academic performance.

11. Research and critiques suggest that GPA requirements can perpetuate systemic biases. Factors such as socio-economic status, racial discrimination, and unequal access to resources can influence students' academic outcomes, making it harder for students from disadvantaged backgrounds to meet stringent GPA thresholds. As a result, GPA requirements have been scrutinized for inadvertently reinforcing educational inequalities.

12. Modern academic societies, like HonorSociety, have recognized these issues and are moving towards more inclusive criteria that do not solely rely on GPA. By eliminating GPA requirements, these societies aim to foster diversity and mitigate the effects of systemic bias, providing opportunities for a broader range of learners to be recognized for their potential beyond academic grades.

13. By design, HonorSociety is an inclusive society. It recognizes the achievements of the students with higher grades but does not leave the rest behind. That is in part because students come from a variety of circumstances and are not a level playing field with regard to educational opportunities. Some students must take care of sick family members, or are disabled in ways that affect academic performance, or are single parents and primary caregivers, and/or must work full-time to pay for their education. On the other hand, some students have access to greater privileges to more easily afford teaching materials and/or tutors, and can focus more attention on academic pursuits.

14. Acknowledging that such realities may have a greater impact on grades and test score than a student's potential, work ethic, etc., many universities no longer require SAT test results in admitting students to their colleges.

15. Thus, my philosophy, and HonorSociety's philosophy, is that even if a student has a lower GPA, the fact that they join an honor society says that they have hope and desire to excel. Such students have not given up and HonorSociety extends them a hand to help them go further. They receive full access to HonorSociety's benefits.

16. Many other long-established honor societies similarly do not require GPA as a criterion for admission. Attached as **Exhibit 2** is a true and correct copy of a webpage at [http://naehs.org/student\\_eligibility/showing](http://naehs.org/student_eligibility/showing) that the eligibility requirements for the National Adult Education Honor Society, found do not include any GPA cutoff. And attached as **Exhibit 3** is a true and correct copy of a webpage at <https://gsas.yale.edu/edward-alexander-bouchet-graduate-honor-society> for the Bouchet Graduate Honor Society, founded by Yale University and Howard University in 2005, which also does not include GPA restrictions.

17. Due in part to its inclusive culture and valuable benefits, HonorSociety has experienced consistent year-over-year growth since its founding (at least until this lawsuit).

18. Most of that growth has occurred in the market for honors societies for four-year universities, in which HonorSociety has competed since it began business in 2014.

19. And while most of HonorSociety's revenue and focus has been on that market, HonorSociety's members also include graduate students, professional members, and high school students, as well as students at two-year community colleges. About 10% of HonorSociety members now come from the two-year community-college market.

### **C. PTK and the current lawsuit**

20. PTK took notice of HonorSociety's entrance into the community-college market, a market PTK has dominated for years. PTK considers HonorSociety a threat, which is surprising considering the small fraction of HonorSociety's members that come from community college ranks.

21. Well before this lawsuit started, PTK hired a private investigator to investigate HonorSociety and me, who referred to himself as the "Ruthless Enforcer."

22. In contrast, due in part to the generally amicable relations among most honor societies, HonorSociety never considered PTK in its business plans and strategies before this lawsuit.

23. I was therefore surprised when, in April 2022, PTK filed this lawsuit without any prior notice. I was even more surprised by PTK's utterly baseless allegations that HonorSociety

copied PTK by using a wreath to signify academic achievement, using blue and gold colors on its website, and offering gold regalia. That is because multiple honor societies use blue and gold colors, such as Phi Beta Kappa, Golden Key International Honour Society, National Honor Society, etc., and multiple honor societies are use gold stoles, such as Golden Key International Honour Society, National Society of Collegiate Scholars, Mortar Board, Alpha Gamma Sigma (which also operates in community college space).

24. As intended, PTK's scorch-earthed litigation tactics have taken a toll financially on HonorSociety and on me personally. Due to constant engagement with this case, and PTK's meritless motions, for example, I have been unable to spend quality time with my two infant children.

25. But despite the cost and toll, I firmly believe that HonorSociety's existence and mission are worth defending.

**D. PTK's actions after this lawsuit commenced confirms its intent to destroy HonorSociety.**

26. PTK's intent to inflict maximum pain on HonorSociety through this lawsuit is evident by its request to enjoin purported conduct that it first engaged in.

27. For example, immediately after filing this lawsuit, PTK put out a completely false press release announcing that HonorSociety was intentionally misleading students. PTK's press release invited students to contact the BBB and the attorney general and complain about HonorSociety, which many did.

28. Immediately after PTK's press release, HonorSociety's number of new memberships dropped drastically.

29. PTK subsequently released "student" journalism articles, citing to PTK representatives referring to HonorSociety as a "scam."

30. PTK's primary stated reason for claiming HonorSociety is a scam is because HonorSociety does not have a grade cutoff.

31. However, PTK's vice president further claims in the articles that HonorSociety uses the "official appearance of the emails to entice the student to give out their billing information."

Attached as **Exhibit 4** is a true and correct copy of such an article at the Tyler Junior College student publication TheDrumBeat, titled Gone phishing: New email scam is being sent to TJC students (<https://thedrumbeat.com/news/gone-phishing-new-email-scam-is-being-sent-to-tjc-students/>).

32. PTK similarly made public posts on Facebook, claiming that no organization by the name Honor Society exists, declaring HonorSociety a “scam,” and including screenshots of HonorSociety invitation emails overlayed by a red “x.” Attached as **Exhibits 5 and 6** are true and correct copies of such Facebook posts, also found at <https://www.facebook.com/WrightTimesNews/photos/a.1711490992402698/1949188981966230> and <https://www.facebook.com/PTKAlumniOfWashburn/photos/scam-alert-ptkaw-members-and-alumni-please-share-this-with-everyone-you-know-who/1513044288792096/> .

**E. This lawsuit revealed PTK’s troubling practices, which the public deserves to know.**

33. In addition to PTK’s misleading and false statement regarding HonorSociety, this lawsuit has brought to light harmful misrepresentations by PTK to prospective students and other alarming conduct. And the general public and marketplace should be warned, as explained below.

**F. PTK’s misrepresents that it only invites students in the top 10% of their schools.**

34. PTK sends invitations to students informing them they are being invited to join PTK because they are in the top 10% of their school. Attached as **Exhibit 7** is a true and correct copy of PTK’s invitations to prospective members that were posted on social media.

35. Attached as **Exhibit 8**, are true and correct copies of other PTK invitations to students, marked to highlight PTK’s misrepresentations.

36. PTK has also posted on social media similar statements claiming that its members are the top 10% of their colleges. **Exhibit 8** Unsuspecting invited students then repost such representations on their own social media profiles. **Exhibit 8**

37. PTK’s claim that students are in the top 10% of the class leads students to believe they belong to an elite group, and into paying PTK’s membership as a result. As an example,

TikTok user @reeeeeganw posted a video after receiving PTK's invitation stating that she was ranked in the top 10% of her class. That video is available here:

<https://www.tiktok.com/@reeeeeganw/video/7377477894144101674>.

38. But students have no way of knowing their ranking because colleges do not give out that report. And in fact, PTK's claim that it only invites students in the top 10% of their classes is verifiably false.

39. Even PTK's bylaws state they accept members with a 3.0 GPA or higher. Attached as **Exhibit 9** is a true and correct copy of PTK's bylaws. But at most, PTK's college chapters restrict membership to a 3.5 GPA, which falls between a 20 to 47 percentile of most schools.

40. Attached as **Exhibit 10** is a webpage for PTK's Grand Rapids Community College chapter advertising that all students with a 3.5 GPA are eligible to join PTK. Yet attached as **Exhibit 11** is a true and correct copy of Grand Rapids Community College's response to HonorSociety's public records requests showing that over a five-year period, 27–36% of its students met the PTK's 3.5 GPA threshold. On information and belief, PTK then sent all those students invites—not just 10% of them.

41. Other records further reveal the grade percentiles of different colleges, and confirm that PTK's invitations are nowhere close to being limited to the top 10% of students. Instead, depending on the college, PTK's invited students often fall only in the 30% to 50% rank of their school, and normally not less than the top 20%.

42. By way of additional example, records received from Holyoke Community College show that 54% of its students meet PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Holyoke Community College reflecting this information is attached as **Exhibit 12**.

43. Similarly, records received from Carl Sandburg Community College show that 33% of its students meet PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Carl Sandburg Community College reflecting this information is attached as **Exhibit 13**.

44. Likewise, records received from Heartland Community College show that 32% of its students meet PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Heartland Community College reflecting this information is attached as **Exhibit 14**.

45. Records received from Triton College further show that 27%–43% of its students over the last five years met PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Triton College reflecting this information is attached as **Exhibit 15**.

46. In addition, records received from Alvin Community College show that 34% of its students meet PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Alvin Community College reflecting this information is attached as **Exhibit 16**. A true and correct copy of a screenshot of Alvin Community College's website showing PTK's 3.5 GPA requirement is attached hereto as **Exhibit 17**.

47. Similarly, records received from Wor-Wic Community College show that 45% of its students meet PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Wor-Wic Community College, reflecting this information is attached as **Exhibit 18**. A true and correct copy of a screenshot of Wor-Wic Community College's website showing PTK's 3.5 GPA requirement is attached hereto as **Exhibit 19**.

48. Furthermore, records received from Lake Land College show that over a five-year period 40–53% of its students have a 3.5 GPA or higher. And because PTK's GPA cutoff for Lake Land College is 3.25, a much greater percentage of the students even than that receive invites from PTK—certainly not just the top 10%. A true and correct copy of public records produced by Lake Land College, reflecting this information is attached as **Exhibit 20**. A true and correct copy of a screenshot of Lake Land College's website showing PTK's 3.25 GPA requirement is attached hereto as **Exhibit 21**.



49. Additionally, records received from Iowa Lakes Community College show that 20% of its students meet PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Iowa Lakes Community College, reflecting this information is attached as **Exhibit 22**.

50. Also, records received from Illinois Valley Community College show that 19.4% of its students meet the PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Illinois Valley Community College, reflecting this information is attached as **Exhibit 23**.

51. And records received from Great Basin College show that 18% of its students meet the PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Great Basin College, reflecting this information is attached as **Exhibit 24**.

52. Moreover, records received from Northern Essex Community College show that over a five-year period 23–30% of its students meet the PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Northern Essex Community College, reflecting this information is attached as **Exhibit 25**.

53. Moreover, records received from Illinois Central College show that over a five-year period 31–39% of its students meet the PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Illinois Central Community College, reflecting this information is attached as **Exhibit 26**.

54. And records received from College of Central Florida show that 42.5% of its students meet the PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Great Basin College, reflecting this information is attached as **Exhibit 27**. A true and correct copy of a screenshot of College of Central Florida's website showing PTK's 3.5 GPA requirement is attached hereto as **Exhibit 28**.

55. And records received from Central New Mexico Community College show that 33% of its students meet the PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true

and correct copy of public records produced by Great Basin College, reflecting this information is attached as **Exhibit 29**.

56. And records received from Fulton Montgomery Community College show that 34.8% of its students meet the PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Great Basin College, reflecting this information is attached as **Exhibit 30**.

57. Records received from Southeast Community College show that 30.8% of its students meet the PTK's 3.5 GPA threshold, who PTK then sends invites—not 10%. A true and correct copy of public records produced by Great Basin College, reflecting this information is attached as **Exhibit 31**.

58. While PTK's chapters at the aforementioned colleges required a 3.5 GPA, some PTK chapters have lower requirements, such as a 3.0–3.3 eligibility, and are also deceptively told that they are eligible for PTK's "elite" club.

59. For example, attached as **Exhibit 32** is a true and correct copy of a social media post by a student at the Mississippi Gulf Coast CC. The student was invited to join PTK and told she was in the top 10% of her class with a 3.29 GPA. But publicly available data on Dean's list award puts a 3.3 at worse than 30–40th percentile. Attached as **Exhibit 33** is a true and correct copy of that data from Mississippi Gulf Coast Community College, found at <https://mgccc.edu/2024/01/fall-2023-presidents-and-vice-presidents-lists/>.

60. Moreover, PTK is well-aware of this because its current president and CEO was previously employed by the school. A true and correct copy of PTK President and CEO Lynn Tincher-Ladner's LinkedIn profile is attached as **Exhibit 34**.

61. These are just some of numerous examples of students being misled by PTK's falsehoods.

62. It alarms me that PTK misleads America's community college students—around 130,000 each year—into spending money to become members of an "exclusive honor society" under the false belief that they are in the top 10% of their community colleges.

63. But PTK not only misrepresents students' class rank to students. PTK also makes similar misrepresentations to colleges and potential employers, in deceitful letters of recommendation. Specifically, PTK issues letters of recommendation on behalf of its members, with PTK President and CEO Lynn Tincher-Ladner's signature, claiming that the PTK member is in the top 10% at their school—without any basis. Attached as **Exhibit 8** are true and correct copies of such letters, with the untrue statements marked for clarity.

64. This misrepresentation deceives students, colleges, and employers about the actual merit of PTK membership. It also is unfair to other students with the same or better credentials and GPA but whose letters of recommendations are truthful about their class rank.

**G. PTK's misrepresents material facts regarding scholarships.**

65. PTK's invitation further claims that the average PTK member receives \$2,500 in scholarship per year. Attached as **Exhibit 8** is a true and correct copy of such an invitation.

66. Students unfortunately rely on PTK's claim they will receive scholarship money when joining PTK, and are disappointed when they finally discover it was all a farce. Attached as **Exhibit 35** is a true and correct copy of one student's response to a survey expressing such disappointment.

67. PTK also claims that members have exclusive access to \$246 million in transfer scholarships. Attached as **Exhibit 8**, is a true and correct copy of that claim in a PTK invitation. But many such transfer scholarships (for students transferring from a community college to another school) would be granted to students regardless of whether they are PTK members.

68. Students, whether PTK members or not, deserve to know how PTK operates, and the strings attached to the transfer scholarships PTK claims to offer. Surely for that reason, numerous PTK employees have left online reviews in attempts to expose PTK's unethical practices. See **Exhibit 8**, showing true and correct screenshots of such online reviews, marked for emphasis.

69. PTK's college partners also deserve to know the inaccuracy of PTK's scholarship numbers, as some schools parrot PTK's misrepresentations to their students. Attached as

**Exhibit 36**, are a true and correct copy of advertising materials from one school, Mississippi Gulf Coast Community College, unknowingly passing along PTK's misleading scholarship figures to its students.

**H. PTK sells student info**

70. PTK also has accused HonorSociety of causing colleges to violate privacy agreements prohibiting the disclosure of student email addresses.

71. Yet PTK sells its students' personal information including emails to for-profit entities. It does this by first selling member information to an entity not disclosed in its terms and conditions or privacy policy—the Phi Theta Kappa Foundation. That foundation in turn sells the students' information to universities and businesses.

72. PTK's program selling private student data to universities is PTK Connect, while its program selling private student data to businesses is PTK Connect for Business. But PTK's terms and conditions with its members omit any specific mention of these programs or that PTK sells student data. Attached as **Exhibit 37** is a true and correct copy of those terms and conditions omitting that students' personal information is for sale, found also at <https://www.ptk.org/policies/membership-terms-conditions/>.

73. PTK markets its members' contact information through these programs based on the same misrepresentation that its members are in the "top 10%". For example, the PTK Connect for Business program's website (<https://ptkbusiness.org>) falsely offers to sell access to the "top 10% of community college students in America." A true and correct copy of the PTK Connect for Business website homepage is attached as **Exhibit 38**.

74. These programs generate around \$2 million to PTK each year. Attached as **Exhibit 39** is a true and correct copy of PTK's Form 990 tax filing for non-profit organizations showing that it received \$1,961,684 of revenue from "PTK CONNECT SUBSCRIPTIONS," which was downloaded from ProPublica's Nonprofit Explorer online entry for Phi Theta Kappa located at <https://projects.propublica.org/nonprofits/organizations/646012238/202332429349300118/full>.

75. PTK's students have no knowledge of any of this. And then they wonder why they are bombarded with advertising emails when they join PTK. Attached as **Exhibit 40** is a true and correct copy of a few student responses to surveys complaining about being spammed after joining PTK. They deserve to know why.

**I. Sexual harassment**

76. Toni Marek was the victim of sexual assault by PTK's previous executive director.

77. PTK tries to prevent these victims' stories from being told through a gag order. It does so in order to profit from students who would not join PTK if they knew.

78. Yet students should know Toni and other's stories, and not just so they can make a more informed decision whether or not pay PTK's membership fee. Rather, sexual harassment is a matter of public concern.

79. Moreover, many colleges formally oppose sexual assault and violence against women. Those colleges similarly will appreciate knowing whether they are supporting an organization with such a history.

**J. Alleged Embezzlement**

80. In February 2024, Robin Lowe was arrested in Mississippi for allegedly embezzling funds meant to benefit the PTK chapter for which she had been an advisor for 15 years.

81. According to a public statement issued on February 12, 2024 by the Mississippi Office of the State Auditor:

Today State Auditor Shad White announced Special Agents from his office have arrested Robin Lowe. Lowe was the former advisor for the Phi Theta Kappa (PTK) chapter, which is a national honor society at the Itawamba Community College. She is charged with embezzlement.

Lowe is accused of converting public funds meant to benefit the PTK chapter for her own personal use. Lowe was the advisor for the honor society from 2008 to May of 2023. ...

82. That statement is available on the Mississippi Office of the State Auditor's website at <https://www2.osa.ms.gov/news/former-itawamba-community-college-honor-society-advisor-arrested-for-embezzlement/> and a true and correct copy is attached as **Exhibit 43**.

83. The public should be allowed to know that a PTK advisor allegedly embezzled funds intended to benefit its student members, regardless of the advisor having left the organization when she was caught.

**K. HonorSociety's posts regarding PTK's misrepresentations and bad acts.**

84. I have reviewed Jonathan Polak's declaration complaining about HonorSociety's posts on [honorsocietyfoundation.org](http://honorsocietyfoundation.org), [honorsocietymuseum.org](http://honorsocietymuseum.org), [honorsociety.org](http://honorsociety.org), and [honorsociety.com](http://honorsociety.com). Those posts warn students of PTK's misrepresentations, illegal acts, and anticompetitive behavior, which should not be hidden from the public.

85. The articles appear on those four websites and, to HonorSociety's knowledge, have not been posted anywhere else on the internet. Nor to its knowledge, has any press or media outlet reported about them.

86. The posted statements are true, and closely track the allegations HonorSociety asserts in this lawsuit. Despite PTK's complaints about this, publicly posting material about the lawsuit is nothing new for PTK.

87. HonorSociety's posts respond to PTK's press release about the litigation, with HonorSociety's side of the story.

88. HonorSociety's posts are not commercial messages.

89. They cover issues of public concern about PTK including sexual harassment allegations, alleged embezzlement by a chapter advisor, and PTK's deceptive advertising tactics as detailed above.

90. The posts do not ask students to sign up with HonorSociety or otherwise propose any other type of commercial transaction. Nor are they paid advertisements. They may actually have the opposite effect, namely, that student awareness of PTK's conduct turns them off to the entire industry.

91. In spite of the large number of posts due to the large number of PTK chapters, the posts are not highly visible in Google search results for "PTK" or "Phi Theta Kappa." In fact, they don't even show up on the first page of results or in the image search results. Only with

narrowed searches for “PTK litigation” or “PTK lawsuit” do some results begin to show up in the images of the first page of results. Attached as **Exhibits 44–47** are true and correct screen captures of different Google search results showing this. Thus, the posts are primarily seen by those who are searching for information about the lawsuit.

92. Moreover, the posts are all located on HonorSociety websites, which any student capable of reading a URL or other conspicuous information on the page would recognize as being affiliated with Honor Society. It is abundantly clear that HonorSociety and the posts are not affiliated with PTK.

**L. Many of PTK’s issues with the posts were in only in the first iteration and subsequently changed.**

93. PTK is correct that the posts were initially generated with the use of AI. These AI-generated posts/articles were first published between June 18–24, 2024.

94. Prior to June 25, 2024, all the posts were revised and republished using templates.

95. The revised and republished posts—which now have not been online for weeks—address some of PTK’s issues with the posts.

96. For example, PTK asserts that some of HonorSociety’s posts were written in the voice of the colleges. But the AI tool used to generate the initial posts was specifically commanded in a prompt not to speak in the voice of the community college—but instructed instead that the voice should be objective third-party neutral. Attached as **Exhibit 48** is a true and correct copy of those prompt instructions. Those initial posts were all offline by June 25, 2024, and replaced with the non-AI-generated templates.

97. Thus, to the extent any posts resembled a voice of a colleges, it was unintentional and the result of AI-generation in spite of intentional instructions to the contrary and those posts have not been online for weeks. HonorSociety has since removed all AI-generated written content and replaced it with templated content, in order to maintain quality control. Attached as **Exhibit 49** is a true and correct copy of those templates.

98. Attached hereto as **Exhibit 50** are true and correct copies of PTK employee posts on the website Glassdoor, which accepts reviews from its users about their employment experiences. HonorSociety is not responsible for any of the GlassDoor posts.

I declare under penalty of perjury under the laws of the United States that to my knowledge the foregoing is true and correct.

Executed on July 10, 2024

DocuSigned by:  
*Mike Moradian*  
2870F22B88B2441E  
\_\_\_\_\_  
Michael Moradian